

28 U.S.C. § 1746 DECLARATION OF ALBERTO SANCHEZ

1. My name is Alberto Sanchez. I am over the age of eighteen (18), and I am competent and qualified to make this Declaration. I have personal knowledge of the facts in this Declaration and they are true and correct.

2. I am a former employee of Land Restoration LLC and Land Restoration Holdings LLC ("Land Restoration"). I worked at Land Restoration from approximately 2012 to approximately 2014. Land Restoration is a business that does residential and commercial landscaping design, construction and maintenance, often for very expensive luxury homes and properties. I was a worker and manual laborer for Land Restoration and I worked in landscaping and construction, digging holes and planting plants and trees, installing lawn turf and plants, loaded and unloaded trucks with landscaping materials, and worked on various landscaping and construction projects. At any one time, Land Restoration employed approximately 20 workers who did manual labor similar to me.

3. During my employment at Land Restoration, I regularly worked more than forty hours per week. However, Land Restoration did not pay me and the other workers overtime pay for any hours worked over 40 in a work-week. During my employment, Land Restoration just paid the same hourly rate for all hours worked, no matter how many were worked in a week.

5. Moreover, even when I was paid hourly, Land Restoration regularly failed to pay me and my coworkers for all hours worked. Managers, including Roberto and Guillermo would write down hours for us, but our pay checks would not include all the hours we worked. I would sometimes tell my boss that my pay was short, and he would tell me that Land Restoration would make it up in the next pay check, but they never would.

6. I know that the other workers/manual laborers at Land Restoration also were paid in the same way I was paid and did not receive overtime pay or rates for hours worked over 40



hours a week and were not paid for all hours worked. I know this from my conversations with other coworkers where we talked about how we were paid and how we did not get paid overtime and were not paid for all the hours we worked. My coworkers and I frequently talked and complained to each other about this.

7. I have talked to other worker/workers who used to be employed and are still employed by Land Restoration. Based on what I have heard and know about these worker(s), I believe they are afraid of joining this lawsuit because they are afraid they will be fired or retaliated against. Some current or former workers at Land Restoration may also be scared to join this lawsuit because of possible questions or issues about their residency or citizenship. I have heard from former or current Land Restoration employees that after the lawsuit was filed, Land Restoration management spoke with some of the employees to investigate and ask questions about who was involved in the lawsuit. I have heard that after the lawsuit was filed, Land Restoration began paying current employees overtime.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16 day of January, 2017.



Alberto Sanchez

Translators Certificate:

I certify that I am fluent in both Spanish and English and that I translated this document to Alberto Sanchez in Spanish, and he affirmatively indicated that he understood its contents and significance.

Translator: _____

Date: January 16, 2017

State of Texas §

County of Travis §

Subscribed and sworn before me, this 16 day of January, 2017.

